

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOFTWARE FREEDOM CONSERVANCY, INC. : 09 Civ. 10155 (SAS)  
and ERIK ANDERSEN,

Plaintiffs

-against-

BEST BUY CO. INC., et al.,

Defendants.

**INITIAL DISCLOSURES  
PURSUANT TO RULE 26 (a)(1)  
OF ROBERT BOSCH LLC**

Pursuant to Fed. R. Civ. P. 26(a)(1), defendant Robert Bosch LLC. (“RBLLC”)<sup>1</sup> makes the following initial disclosures:

1. Name and, if known, address and telephone number of individuals likely to have discoverable information and the subjects of such information which RBLLC may use to support claims or defenses, other than solely for impeachment:

1. U. S. DVR4C Sales and Marketing

There is no such individual at RBLLC. Christopher Johnston, Marketing Development Manager – Video Content. Mr. Johnston has a business address and telephone number of 850 Greenfield Rd., Lancaster, Pennsylvania 17601, United States, Tel: (717) 735-6372, but should be contacted through RBLLC’s counsel of record.

2. Development of DVR4C firmware.

<sup>1</sup> Robert Bosch LLC has nothing to do with the DVR4C system which is the subject of the Complaint as to it. Counsel for RBLLC has explained this to plaintiffs’ counsel and suggested that plaintiffs and Robert Bosch LLC stipulate that Bosch Security Systems, Inc., the entity which sold and distributed the DVR4C system in the United States, should be substituted for Robert Bosch LLC as a defendant. Because that has not yet occurred, initial disclosures are provided for the existing defendant, but with the expectation disclosures will be provided for Bosch Security Systems, Inc. if it is substituted for RBLLC as a defendant.

There is no such individual at RBLLC. Frank Verschuren, Chief Technical Officer, Video Systems & Products. Mr. Verschuren has a business address and telephone number of Glaslaan 2, Eindhoven, Noord-Brabant, 5616 LW, Netherlands, Tel: 31(0) 40-25 77122, but should be contacted through RBLLC's counsel of record.

3. Scope of copyright it is claimed has been infringed.

Erik Andersen, 325 North 525 East, Springville, Utah 84663, (801) 489-4042.

RBLLC reserves the right to supplement this list as it acquires further information through discovery or investigation. RBLLC additionally identifies all persons who may be named or referred to in court papers, depositions and/or responses and documents produced in the course of discovery.

2. Description by category and location of all documents, electronically stored information and tangible things in RBLLC's possession, custody or control which RBLLC may use to support its claims or defenses, other than solely for impeachment.

RBLLC has no such documents, electronically stored information or tangible things in its possession, custody or control, as it was never involved with the design of, or the sale or distribution in the United States of, DVR4C.

Correspondence and e-mails with plaintiff SFC prior to commencement of suit are located in the Bosch North American legal files located on a computer server in Mount Prospect, Illinois.

Investigation continues.

3. Computation of each category of damages claimed by BSS

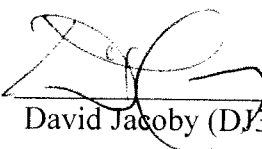
RBLLC has not asserted a claim for damages. RBLLC reserves its rights to assert claims for attorneys' fees and costs under Title 17, U.S. Code, or otherwise.

4. Insurance agreements

RBLLC is aware of none.

Dated: New York, New York  
March 8, 2010

SCHIFF HARDIN LLP

By:   
David Jacoby (DJ3440)

Attorneys for Defendant  
Robert Bosch LLC  
900 Third Avenue  
New York, NY 10022  
(212) 753-5000